

Exhibit 31

Omnibus Mao Declaration

Message

From: Lorraine Twohill [lorraine@google.com]
Sent: 1/29/2021 3:30:31 AM
To: Sundar Pichai [sundar@google.com]; Rahul Roy-Chowdhury [rahulrc@google.com]; Jen Fitzpatrick [jen@google.com]; Luiz André Barroso [luiz@google.com]
Subject: Today is Data Privacy day...so please read!

Hi folks,

As today is International Data Privacy Day (check out our [homepage](#)), and Privacy has been on my mind, as well as all of yours for some time, I wanted to share some thoughts. It has been almost 11 years since I first spoke at Exec Circle (and Ben listened!) about User Trust and needing a Google Account with controls. And 7 years since I did the User Trust tgif. I have been doing a lot of thinking (and asking!) over the years. And we have made a lot of progress but our challenges are even greater. We need more velocity! So, since I know you all agree, and I know Sundar that you have been thinking about this too, I wanted to share my random thoughts here, as hopefully somewhat useful and actionable. And yes there will be reasons why a lot of this is hard, but we are at our best when solving really hard problems! And then just maybe we could get to this vision that we put together just over a year ago,

With the greatest of respect, and apologies in advance for my ramblings...

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What I think we need:

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2. Much more visible comms on and off product
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- 4.
5. Privacy as a feature/products making meaningful change
- 6.
- 7.
8. Definitive progress in ads, including showing that we are ok losing out too
- 9.
- 10.
11. Owning our absolute strength in security
- 12.
- 13.
14. Other random ideas that could help

1. Much more visible comms on and off product

In 2020, we sent over █████ users to our privacy check ups and █████ to our security check up from our homepage and promo efforts. But it feels completely separate from those *moments of truth* when a user is in-product and needs our help. What if we:

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- **Roll-out a consistent 'Safer with Google' brand system and icon more aggressively across our products.** There's a number of moments in product where we already use the shield and messaging to signal

privacy and security protections (e.g., "only you can see this" for Google Account related queries in Search and in My Activity). But we need to accelerate implementation across PAs so it shows up in the products people use every day.

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- **Increase user facing reassurances in-product:** No more unexplained features or cross-product data usage that freaks a user out. We know that a feature can trigger user concern over how their data is being used and why (particularly x-app). Increase investment and prioritize ██████████ to provide users with helpful transparency, education, and access to their controls in these moments.

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- **Explain ourselves much, much better. And do that everywhere.** This is not new work but is a compelling way of talking about the data we have, 3 types of data, stuff you save, stuff you do (your activities) and stuff we use for ads (much smaller). If we did this well, everywhere, including in your Google Account, it would help a lot.

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- **Move our promo real estate to the TOP of the screen in mobile.** Instead of push-up promos, move them to the top of the screen so they are unmissable. Instagram P&S promos are at the top of the screen. Twitter's promos are overlays. At the bottom of the screen, ours don't have the same gravity and visibility, making our P&S messages feel unimportant/optional. By adding some friction we will increase engagement and demonstrate to users and KOFs that privacy and security are a top priority.

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- **Establish GSEC(Google Safety Engineering Center) in the US.** Building on the successful launch of GSEC Munich (and GSEC Dublin) let's identify key offices where we have strong privacy efforts (e.g. Cambridge for Chrome) and establish GSEC in the US as a key part of our KOF outreach efforts.

2. Privacy as a feature/products making meaningful change

We need more products built upon our privacy north star that PDPO has been championing. Our collaboration with Pay is a good example of how a product can build privacy and security right into the product ('A safer way to pay'). But there is more that is needed to ensure that across the company we live up to the new privacy principles and develop consistent, scalable privacy features that bring those principles to life. Could we start with:

Giving users more transparency and control over their data

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- **Apps have to ask permission to access your data**, not just assume that all of Google can access. By asking users permission to link their Inbox with Maps, we can avoid trigger moments like hotel reservations showing up in Maps. Or at least we show a card the first time it happens, to explain that App A knows this info from App B. (Vault could be a great answer here)

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- **All products to be transparent on data usage.** What is tracked, what is it for, what is in it for the user; give users ability to turn off ANY of the data in any of the products in a way that they want. Introduce 100% comprehensive and consistent data use labeling: anytime and everywhere we use user data.

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- **Make it easier for users to delete data.** Streamline the current path - go to Google Account, Click on Data & Personalization, Click on My Activity, Click on Delete and go from there - by further improving the delete actions in Google Account and surfacing 'delete activity' in key product surfaces. Make delete feel easy

and immediate. Let's more aggressively surface 'auto delete' options and make it easier for people to access the tool

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- **Give users the option to choose from pre-packaged settings bundles (low, medium, high).** Based on "user profiles" (e.g. recommend to set data retention to 3 months, actionable in a simple one-click way: you choose the "type" you want (e.g. full anonymity, balanced setting, enable all data sharing), and this applies automatically across all Google settings. Like the "privacy slider" idea we had years ago.
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- **Continue to improve Google Account as the single destination for users' privacy and security choices.** Elevate controls more visibly to account homepage, add new products and features, like our password protection (e.g. Build "LifeLock" into the Google Account. People pay for services like LifeLock to protect them from identity theft - a constant concern and growing with more online commerce. Could make it an G1 upgrade feature.

Creating more visible, ownable privacy products and brands:

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- **Vault/keeping my most important documents 'off the grid', like a private cloud for (sensitive health info, taxes, property deeds, passport, etc).** The Vault idea has been knocking for many years now, a clear product opportunity exists to give people ultimate control and keep their most valuable digital stuff safe.
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- **Make Incognito mode truly private:** Make Incognito mode truly private by strengthening it with a free VPN, making it for signed-in only users, turning cookie blocking on by default, ensure sessions/tabs disappear by default after period of time, and adding cautionary language at moments like 3P sign-in. We are limited in how strongly we can market Incognito because it's not truly private, thus requiring really fuzzy, hedging language that is almost more damaging

3. Make faster and more demonstrable progress on ads

Users point to our ads as THE reason why they can't trust Google and why they think we sell their personal information to 3rd parties. While we have made great progress with things like our recent Privacy Sandbox announcement there is more we need to do here faster. We could start with:

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- **Focus on where we think the long term is in Ads.** Be more focused about which parts of the ads business we want to get behind (i.e. real time bidding on user data = bad; contextual ads in search = good). With [REDACTED] [REDACTED] we will be taking a more declarative stand on what we think are acceptable uses of data on the web. It will allow us to distance ourselves from cross-site tracking while reiterating the importance of direct relationships between people and the brands/publishers they choose. However, [REDACTED] is scoped to just the web - we need to accelerate efforts to align on a consistent set of practices across all the places where people see digital advertising, including mobile (Android, iOS), and connected TV.
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- **Improve Ads Settings/make this a much bigger deal:** Let people see what is used to target them and let them adapt it/change it/suggest new things. This [page](#) is decent, we need to tell people about it in product and link to it, and we need to promote it and also make it better.
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- **Making Mute this Ad a more valuable property.** Every ad has 'mute this ad' but the current experience is limited and does not allow us to tell our story to our users. Can we add more transparency about why they're seeing this ad, point to ads settings controls, more opportunities to engage users, more space to tell our story to make this a more valuable experience for our users.

- **Accelerating potential changes in ad retargeting.** This is one of the top triggers for users when it comes to concerns that Google tracks them and shares/sells their information with 3rd parties. Explore options ranging from making it easier for people to opt-out in the moment (e.g. 'stop personalized ads for me' button), to changing timing of retargeting (e.g. increase time lapse) or specificity (e.g. less specific). Accelerate efforts underway within Ads to address this and improve the consumer experience:

- **Further accelerate Privacy Sandbox efforts:** As part of the Privacy Sandbox effort to replace 3P cookies in Chrome, there are technology proposals to enable brands to deliver tailored ads to those who have had prior interaction with their site (i.e. retargeting) - but in a way that would not be as specific to an individual product (e.g. ad for men's running shoes vs. ad for Size 12 Men's Blue Nike Cross-Trainers)

- **Push for Privacy Norms faster:** In parallel to Privacy Sandbox, Ads is working to get internal alignment on a set of privacy norms / commitments that would govern how Google's ads products work. There are norms being discussed that would impact retargeting in areas such as timeliness (ensuring there is some delay before retargeting ads appear to avoid 'spooking' users with their immediacy); ensuring that there is a time cap on how long retargeting ads appear to avoid annoying users); frequency (ensuring there is a limit on # of times retargeting ads are shown); specificity (ensuring that the information surfaced in the ad is relevant but not overly specific such that it causes concern).

- **Increase velocity around Experiments:** Beyond the Privacy Sandbox and Privacy Norms efforts, there are also user experiments being conducted in Ads, such as one that notifies users at the point that a website is attempting to add them to a retargeting list, giving them an option to opt-out

- **Explore tagging ads that preserve privacy.** Introduce a visual system for Ads that (in the future) are served in a privacy preserving way (i.e. targeting via Privacy Sandbox technology, handled on device, anonymized). Make this work across all surfaces, building from Chrome. Brand these ads!

- **Mythbust Data Selling:** [REDACTED] of users believe we sell their data. We need to do more to communicate to them **in-product** that their data is never sold and never shared without their permission.

4. Owning our absolute strength in security

We do a lot to keep people safe across Chrome, Android, Gmail and your Google account but people have no idea. We keep lots of KOFs safe and governments, but do we tell them? Users see privacy and security as two sides of the same coin so our leadership here is a huge opportunity. Could we:

- **Develop a bolder Security claim.** What is the equivalent of "Never sell our users' personal information to anyone" for Security. Our current version ("Build the strongest security technologies into our products") does

not seem bold enough. Can we own Safest? Back up with reasons to believe like [REDACTED]t [REDACTED], [REDACTED]d [REDACTED]n [REDACTED]n, [REDACTED]d [REDACTED].

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- **Humanize our Security efforts:** The Defend the User project: tell the stories of the people behind the security features. We have some of the world's top minds working on our security technology - let's tell that story. Have our security engineers interact with DC and local govts more too.

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- **Add helpful security tips to every security email.** The emails we send to verify when users have signed into a new device are the most frequent email we send - super high volume and frequency of impressions - so much so that there are memes online about Google Security detecting anything suspicious

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- **More visibly surface security benefits in user comms.** Remind users of all the occasions where we have their back. One of the reasons MSFT is scoring well on security is that you have to consciously update versions, install virus protections, etc. In our case we do a lot of that invisibly (in Chrome/Chrome OS/Android/Play Protect/Gmail). For example we could: send a monthly Safety summary (x many emails we put into spam for you, x many websites we have flagged as dangerous, security features of our latest Chrome/Android release), we could provide similar info and further safety tips on a "new tab" each time you open one, etc.

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- **Treat users like VIPs when security issues arise:** Beyond communicating how we're activating our 'automatic' protections, such as spam protections in Gmail, we can provide detailed (yet simple!) reports to users when we've addressed a more significant issue such as an Account hack. For more significant security issues, let's connect users with a real person (or at least help make our automated help feel as personalized as possible). Provide reassurance to users, and extend the opportunity for additional dialogue / more information if they have further questions or concerns.

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- **Incentivize users to use our security features.** Put our money where our mouth is. Show that we care about our users' safety so much we will reward them for turning on 2sv, using Password Manager, etc. Epic Games gave a free emote to users in Fortnite for tuning on 2sv and it went viral. We could give Play credit or G1.

5. Other random ideas that could help

These are various other areas we could invest in that would help. We should think about:

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- **Fixing unknown/incorrect age accounts.** We do not currently know who are kids (approx. [REDACTED]M accounts are presumably used by underaged users). We therefore need to supercharge our age verification efforts (accelerate [REDACTED]).

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- **Creating ads free/private paid Google/Google One:** For very privacy sensitive individuals, provide them an option through Google One to use Google Search & Chrome completely ads free.

- **Developing an IoT Privacy Master Switch:** Put all of your iot devices (cameras, speakers, hubs, etc) into private, no history mode with an Assistant privacy action or just one toggle from the Google App.

If you got this far, thank you for reading!

Your privacy obsessed pal...

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